

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankruptcy No. 20-22898-CMB
)	
Ronald G. Linaburg,)	
)	
Debtor,)	Chapter 11
)	
Ronald G. Linaburg,)	
)	Document No.
Movant,)	
)	
v.)	
)	
Diana M. Dongell, D.M.D.,)	
Ronald E. Hand, D.M.D.,)	
Rebecca L. Watkins, D.M.D., and)	
Renee R. Kalp, D.M.D.,)	
)	
Respondents.)	

**EMERGENCY MOTION TO ENFORCE THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. § 362**

AND NOW comes the Debtor/Movant, Ronald G. Linaburg (“Debtor”), by and through his Counsel, Brian C. Thompson, Esquire and Thompson Law Group, P.C., and files the following Emergency Motion to Enforce the Automatic Stay Pursuant to 11 U.S.C. §362, and avers as follows:

1. On March 8, 2021, Respondents commenced a legal action against Debtor in the Common Pleas of Allegheny County at docket no. GD- 21-001958.
2. On March 29, 2021, Debtor commenced an Adversary proceeding, at case number 21-02037-CMB, for violation of the Automatic Stay Pursuant to 11 U.S.C. §362.

3. The Allegheny County claims made in the Respondent's Petition mirror the claims that Respondents have made with this court, as illustrated by Respondents attaching as an exhibit to their motions and Proofs of Claim a copy of the Allegheny County petition.

4. After several hearings before this Court, both Debtor and Respondents mutually consented to participate in mediation in an attempt to resolve the Adversary, in addition to various other motions.

5. This Court entered a Mediation Order, both in the case at bar and the Adversary proceeding, on May 19, 2021.

6. On May 20, 2021, not even a day after this Honorable Court ordered the parties to mediation, Respondents caused to be on Debtor "individually" a Notice of Deposition. (See Exhibit "1").

7. Prior to service Respondents failed to seek relief from the automatic stay or even attempt to communicate their intention of serving the Notice of Deposition of Debtor with Debtor's Counsel, once again ignoring the automatic stay.

8. A Motion for Protective Order has been filed in Allegheny County and is attached hereto for additional reference. (See Exhibit "2").

WHEREFORE, Debtor respectfully asks that this Court enter an Order staying the deposition of Debtor pending mediation and/or, upon notice and hearing, a proper determination by this Court of the Automatic Stay related to this matter.